



25 October 2004

Mr. Art Williams, Director
Louisville Metro Air Pollution Control District
850 Barrett Avenue
Louisville, KY 40204

Re: Proposed STAR Regulations

Dear Mr. Williams:

The International Institute of Synthetic Rubber Producers, Inc. (IISRP) is a non-profit association representing 90% of the global synthetic rubber production. I have members domiciled in 20 countries, many in the United States, two of which are located in Jefferson County. I have a serious concern on the negative impact the proposed STAR regulations will have on my members.

I certainly appreciate the objectives of STAR, however, it goes way beyond the original objectives and process for risk reduction established by the WJCCTF. The IISRP has always been a proponent of industry & government partnership in developing regulatory programs. We were instrumental in collaborating with the US EPA OAQPS in early 1990's in the MACT development. We continue that today with the ongoing residual risk initiative. We opened dialogue with OSHA to a negotiated rule making for the health standard on 1,3-butadiene. All of these efforts have resulted in a win/win situation for all parties, including the general public. I encourage the LMAPCD to follow the collaborative approach of the WJCCTF.

My members, including those in Jefferson County, have made major contributions in emission reductions over the last 10 plus years and will continue to do so. However, there is a point in time at which a company must consider the cost of doing business in one region versus another or when operating costs cannot be recovered.

I am in the unique position of reviewing the global synthetic rubber statistics and how these data have evolved. Ten years ago the United States was the world's largest producer and consumer of synthetic rubber. Today the US is still the largest consumer but now trails Western Europe and Asia in production. Obviously the US has become a net importer. During the last two decades many plant sites have been shut down, dismantled and capacity removed at the expense of several thousand jobs and a substantial tax base for local government.

Placing a burdensome regulatory program like STAR exacerbates this situation, and in fact adds little to improve air quality since industrial sources contribute a small percentage to the overall emission base.

I have reviewed the comments by GLI, NPCA and others and endorse their position on the technical issues. This is a complex regulatory program, no doubt about it. And if it is going to succeed the LMAPCD will need buy in from all parties impacted – industry, government and the general public. I urge you to consider the stakeholder process. Establish working groups on each regulatory components and allow the time it will take to create a successful program.

I appreciate having the opportunity to provide comments on the STAR program and am available as a resource to facilitate in the stakeholder process.

Sincerely,

(Sent via email)

James L. McGraw
Managing Director & CEO
IISRP